Worksheet for Technical Review of Working Draft of Proposed Permit

Writer:	Facility Name:	Company Name:
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Email address:	Remarks Submitted by:	AI #:
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		PER20080005

Instructions

Permits Briefing Sheet", etc.). Permit Reference - Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air

changes in a separate permit action. not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such necessary, by a Professional Engineer licensed in Louisiana. Please Note: New or additional equipment, processes or operating conditions from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if in the permit application this must be noted and the revised information must be submitted. Revised information may be submitted separately Remarks - Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission

proposed permit package and made available for public review during any required public comment period. DEQ Response - DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Public Notice Document	Please see Attachment I – Edited remarks in tracking mode	Changes were made as appropriate.
Inventories, Page 2 of 5	EQT0011 3A-CFB Boiler Unit 3A Velocity should be 64.8 ft/sec reflecting administrative amendment that was previously approved by LDEQ.	This change was made.
Inventories	FOTO012 1R-CFR Roller Unit 3R Velocity should be 64 8 ft/sec	This change was made.
Page 2 of 5	reflecting administrative amendment that was previously approved by LDEQ.	
Specific Requirement #1	Please specify block average of 24 hours.	This change was made.
Specific Requirement #2	Please specify block average of 24 hours.	This change was made.
Specific Requirement	Please restate the following	The statement in question has been reworded as follows:

The HF emission rate change was made. The removal of the Chapter 51 paragraph was not made. The inclusion of this statement indicates that an analysis for the applicability of State MACT was performed and was found not to apply.	See Attachment 3: Statement of Basis - AI687 Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes for 1) deletion of the HF emission rate change and 2) deletion of paragraph related to	Statement of Basis, Page 3
This change was made.	See Attachment 3: Statement of Basis - AI687 Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes for a typo.	Statement of Basis, Page 2
This change was not made. The inclusion of this statement indicates that an analysis for the applicability of State MACT was performed and was found not to apply.	See Attachment 2: Title V Permit Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes to delete paragraph discussing LAC 33:III.Chapter 51 which ELL does not believe are relevant to the MACT determination and will only cause confusion to readers.	Air Permit Briefing Sheet, Page 9
These changes were made.	See Attachment 2: Title V Permit Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes to 1) Revise the HF Subbituminous value to 0.000834 instead of 0.00084 so that it is consistent with Entergy's MACT application recommendation and the current permit. 2) Clarify the CO averaging periods as block averages.	Air Permit Briefing Sheet, Page 8
These changes were made.	See Attachment 2: Title V Permit Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes to clarify the review with regard to the data provided by Entergy.	Air Permit Briefing Sheet, Page 7
This change was made.	changes regarding replacing "modification" with "reopening. See Attachment 2: Title V Permit Comments of ETR.doc which is a Word Document in edit tracking mode with recommended changes to delete the section regarding HF emission rates and maintaining the existing permit levels instead of raising the value.	Air Permit Briefing Sheet, Page 6
This change was made.	See Attachment 2: Title V Permit Comments of ETR.doc which is a Word Document in edit tracking mode with recommended	Air Permit Briefing Sheet, Page 2
The statement in question has been reworded as follows: Permittee shall calculate this emission limitation based upon actual fuel mix that is fed to the boiler in question during any LDEQ required performance test.	Please restate the following Permittee shall calculate this emission limitation based upon actual fuel mix that is fed to the boiler at the time of the initial performance test and annual stack tests as described in SR#5.	cific Requirement
Permittee shall calculate this emission limitation based upon actual fuel mix that is fed to the boiler in question during any LDEQ required performance test. This change was made.	actual fuel mix that is fed to the boiler at the time of the initial performance test and annual stack tests as described in SR#5. Please revise Es = 0.00084 lb/MMBTU to 0.000834 Lb/MMBTU so that it is consistent with the existing permit.	Specific Requirement

Statement of Basis,	See Attachment 3: Statement of Basis - A1687 Comments of	This change was made.	:	
Page 4	ETR.doc which is a Word Document in edit tracking mode with		·.	
	bed in the description of control technology, 2) revising HF	. , ;		
	Subbituminous Coal rate from 0.00084 to 0.000834, and 3)			
	adding "Block" to clarify the averaging time for CO.	3.5	2	
Statement of Basis,	See Attachment 3: Statement of Basis - AI687 Comments of	This change was made.	- , ,	
Page 7	ETR.doc which is a Word Document in edit tracking mode with			
	recommended changes for 1) changing CAM approval from a			-
	permit modification to an administrative amendment under			
	paragraph two, 2) clarifying emission sources to be constructed			
	under paragraph three.			
Comment submitted	We request that you delete Condition 6 from the draft permit	This change was made.	. '	
separately via email	because the MACT analysis does not call for, and the draft			
on 7-29-08	permit does not include, a total organic HAPs limit or a total			
	metallic HAPS limit, per se. Instead, they establish CO and	1000	in the second se	
	particulates as surrogates for controlling these classes of related		\$- - -	
	pollutants. Compliance with the emission limits for these	e e e e e e e e e e e e e e e e e e e		•
	surrogates, and therefore the related classes of HAPS, is			
	determined through proper operation of the MACT technology			
	(good combustion for CO; baghouse for particulate). Testing for		(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	:
	total organic HAPS and total metallic HAPS would not generate			
•	any information relevant to demonstrating compliance	1		
	with the limits in the orbit permit.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
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